UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re Rule 45 Subpoena Directed to eNom, Inc.

Case No.: 2:21-mc-00025 RSL

Related Case No. 2:19-cv-02746-DWL U.S. District Court, District of Arizona

DEFENDANT GODADDY.COM, LLC'S NOTICE OF MOTION AND MOTION TO COMPEL RESPONSE TO RULE 45 SUBPOENA DIRECTED TO ENOM, INC.

NOTED ON MOTION CALENDAR: Friday, March 12, 2021

GoDaddy.com, LLC ("GoDaddy"), by and through its counsel, files this Motion, pursuant to Rules 37(a)(1) and 45(g) of the Federal Rules of Civil Procedure and LCR 37, to compel eNom, Inc. to fully and completely comply with the subpoena issued by GoDaddy in the United States District Court for the District of Arizona in connection with a litigation matter entitled *SiteLock, LLC v. GoDaddy.com, LLC* (Case No.: 2:19-cv-02746-DWL). GoDaddy effectuated service of this subpoena on eNom, Inc. on January 21, 2021, and to date, eNom, Inc. has neither served any objection to the subpoena, nor provided any response to the subpoena. For the reasons stated in the accompanying Memorandum of Law, along with the accompanying

DEFENDANT GODADDY.COM, LLC'S NOTICE OF MOTION AND MOTION TO COMPEL RESPONSE TO RULE 45 SUBPOENA DIRECTED TO ENOM, INC. - 1

LAW OFFICES OF
COZEN O'CONNOR
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999 THIRD AVENUE
SUITE 1900
SEATTLE, WASHINGTON 98104
(206) 340-1000

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| 1 | Declaration of Paula L. Zecchini and attached exhibits in support thereof, GoDaddy respectful | | |
|----|---|-------------------|---|
| 2 | requests that this Court grant its Motion and compel eNom, Inc. to comply with the subpoena | | |
| 3 | DATED: | February 25, 2021 | COZEN O'CONNOR |
| 4 | | | |
| 5 | | | By: s/Paula L. Zecchini |
| 6 | | | By: s/Sydney R. Hitchcock Paula L. Zecchini, WSBA No. 48266 |
| 7 | | | E-mail: pzecchini@cozen.com Nathan Dooley, pro hac vice to follow |
| 8 | | | E-mail: ndooley@cozen.com Sydney R. Hitchcock, WSBA No. 55426 |
| 9 | | | E-mail: sydneyhitchcock@cozen.com |
| 10 | | | 999 Third Avenue, Suite 1900 Seattle, Washington 98104 |
| 11 | | | Telephone: 206.340.1000 Toll Free Phone: 800.423.1950 Facsimile: 206.621.8783 |
| 12 | | | Attorneys for Defendant GoDaddy.com, LLC. |
| 13 | | | Attorneys for Defendant GoDaddy.com, LLC. |
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DEFENDANT GODADDY.COM, LLC'S NOTICE OF MOTION AND MOTION TO COMPEL RESPONSE TO RULE 45 SUBPOENA DIRECTED TO ENOM, INC. - 2

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1 **CERTIFICATE OF SERVICE** I hereby certify that I served the foregoing document via electronic mail on February 25, 2 2021, and due to COVID-19 restrictions via overnight mail on February 26, 2021, to the 3 following: 4 5 Thomas A. Gilson Kevin B. Huff Beus Gilbert PLLC Thomas G. Schultz 701 N. 44th Street 6 Leslie V. Pope Kellogg, Hansen, et al. Phoenix, Arizona 85008 7 (480) 429-3000 1615 M Street, N.W. Suite 400 tgilson@beusgilbert.com Washington, DC 20036 8 (202) 326-7900 Counsel for Plaintiff khuff@kellogghansen.com 9 tschultz@kellogghansen.com lpope@kellogghansen.com 10 I further certify that the foregoing documents have been sent out for personal service, 11 and due to COVID-19 restrictions were also served via overnight mail on February 26, 2021, on 12 the following: 13 eNom, Inc. 14 251 Little Falls Drive Wilmington, DE 19808 15 16 DATED: February 25, 2021 17 COZEN O'CONNOR 18 19 By: s/Paula Zecchini
Paula Zecchini 20 21 22 23 24 25 26 LAW OFFICES OF DEFENDANT GODADDY.COM, LLC'S NOTICE OF MOTION COZEN O'CONNOR A PROFESSIONAL CORPORATION 999 THIRD AVENUE SUITE 1900 SEATTLE, WASHINGTON 98104 (206) 340-1000 AND MOTION TO COMPEL RESPONSE TO RULE 45

SUBPOENA DIRECTED TO ENOM, INC. - 3